

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

RingCentral, Inc.

Application Pursuant to Section 214 of the
Communications Act of 1934, as Amended,
for Authority to Provide Global Facilities-
Based and Global Resale Services Between the
United States and All International Points

File No. ITC-214-2008____ - _____

**APPLICATION—
STREAMLINED PROCESSING REQUESTED**

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.18(e)(1) and (e)(2) of the Commission’s rules, RingCentral, Inc. (“RingCentral”) (FRN 0016083040), hereby requests authority to provide global facilities-based and global resale services between the United States and all international points. RingCentral seeks such authority for its offering of innovative, unified communications, call management, and messaging services aimed principally at the small-business market in the United States. RingCentral has no affiliation with any foreign carrier in any of the destination countries for which authority is requested nor is RingCentral affiliated with any dominant U.S. carrier whose services RingCentral may resell. Thus pursuant to Section 63.10(a)(1) of the Commission’s rules, the Commission should classify RingCentral as a non-dominant carrier in its provision of international telecommunications services on all routes. Because this Application raises no

foreign affiliation, competition, or other public interest issues, RingCentral requests streamlined processing pursuant to Section 63.12 of the Commission's rules.

In support of its request for authority, RingCentral submits the following information pursuant to Section 63.18 of the Commission's rules:

- (a) The name, address, and telephone number of RingCentral are:

RINGCENTRAL, INC.
1 Lagoon Drive, Suite 350
Redwood City, California 94065
+1 650 472 4100 tel

- (b) RingCentral is a corporation organized under the laws of the State of California.

- (c) Correspondence concerning this Application should be addressed to:

John Marlow
Vice President, Corporate Development,
and General Counsel
RINGCENTRAL, INC.
1 Lagoon Drive Suite 350
Redwood City, California 94065
+1 650 472 4107 tel
+1 650 620 1153 fax
johnm@ringcentral-inc.com

with a copy to:

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HARRIS, WILTSHIRE & GRANNIS LLP
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+1 202 730 1337 tel
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kbressie@harriswiltshire.com
Counsel for RingCentral, Inc.

- (d) RingCentral has not previously received Section 214 authority from the Commission.

(e) RingCentral seeks authority to operate as a global facilities-based and global resale carrier pursuant to the terms and conditions of Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules. By its signature below, RingCentral certifies that it will comply with the terms and conditions set forth in Sections 63.21, 63.22, and 63.23 of the Commission's rules.

(f) No response required.

(g) No response is required, as RingCentral does not seek authority under Section 63.18(e)(3) of the Commission's rules.

(h) RingCentral has four ten-percent-or-greater direct or indirect owners:

- (1) Khosla Ventures II, LP ("Khosla II"), owns 21.517 percent of RingCentral's outstanding shares. Khosla II is a limited partnership organized under the laws of the State of Delaware and engaged in the business of investments. Khosla II is owned and controlled by its general partner, Khosla Ventures Associates II, LLC ("KVA II"). KVA II is a limited-liability company organized under the laws of the State of Delaware and engaged in the business of investments. The address of Khosla II and KVA II is:

3000 Sand Hill Road, Bldg 3, Suite 170
Menlo Park, California 94025

KVA II is owned and controlled by its managing member, VK Services, LLC ("VK Services"). VK Services is a limited-liability company organized under the laws of the State of Delaware and engaged in the business of investments. VK Services' address is:

1760 The Alameda, Suite 300
San Jose, California 95126

VK Services is owned and controlled by its managing member, Mr. Vinod Khosla. Mr. Khosla is a U.S. citizen engaged in the business of venture capitalism and a partner in Khosla Ventures, a venture capital firm. Mr. Khosla's address is:

3000 Sand Hill Road, Bldg 3, Suite 170
Menlo Park, California 94025

None of the limited partners in KVA II or VK Services holds a 10-percent-or-greater indirect economic interest in RingCentral, and none holds any voting rights whatsoever in KVA II or VK Services.

- (2) Sequoia Capital XII, L.P. ("SC XII") owns 18.233 percent of RingCentral's outstanding shares. SC XII is a limited partnership organized under the laws of the States of Delaware and engaged in the business of investments. SC XII's address is:

3000 Sand Hill Road
Building 4, Suite 250
Menlo Park, California 94025

None of SC XII's shareholders holds a ten-percent-or-greater indirect voting or equity interest in RingCentral.

- (3) Vlad and Sandra Shmunis, who are husband and wife, and their daughters Ellen and Carolyn (together, "Shmunis Family Members"), indirectly own 23.288 percent of RingCentral's outstanding shares through three limited partnerships, which they own as follows:

- ELCA Fund I, L.P. ("ELCA I"), owns 21.404 percent of RingCentral's outstanding shares. ELCA I is a limited partnership

organized under the laws of the State of California and engaged in the business of investments.

- Carolyn and Ellen Shmunis are limited partners in ELCA I.
 - The Shmunis Family Trust—with respect to which Mr. and Mrs. Shmunis are both trustors and trustees—is a limited partner in ELCA I. The Shmunis Family Trust is organized under the laws of the State of California and engaged in the business of investments. ELCA, LLC—of which Mr. and Mrs. Shmunis are the sole members—is the general partner. ELCA, LLC, is a limited-liability company organized under the laws of the State of California and engaged in the business of investments.
- ELCA Fund II, L.P. (“ELCA II”), owns 0.924 percent of RingCentral’s outstanding shares. ELCA II is a limited partnership organized under the laws of the State of California and engaged in the business of investments.
 - ELCA I and the Shmunis Family Trust are the limited partners in ELCA II.
 - ELCA, LLC, is the general partner in ELCA II.
- ELCA Fund III, L.P. (“ELCA III”), owns 0.924 percent of RingCentral’s outstanding shares. ELCA III is a limited partnership organized under the laws of the State of California and engaged in the business of investments.

- ELCA I and the Shmunis Family Trust are the limited partners of ELCA III.

- ELCA, LLC, is the general partner of ELCA III.

ELCA I, ELCA II, ELCA III, the Shmunis Family Trust, and ELCA LLC share the same address:

2172 Balboa Drive
South Lake Tahoe, California 96150

All of the Shmunis Family Members are U.S. citizens. Mr. Shmunis serves as Chairman of the Board and Chief Executive Officer of RingCentral. The Shmunis Family Members' address is:

2172 Balboa Drive
South Lake Tahoe, California 96150

(4) Mr. Vlad Vendrow owns 10.822 percent of the common shares of RingCentral. Mr. Shmunis is a U.S. citizen and serves as Chief Technology Officer of RingCentral. Mr. Vendrow's address is:

1 Lagoon Drive, Suite 350
Redwood City, California 94065

RingCentral's remaining outstanding shares are owned principally by its employees, but none holds a ten-percent-or-greater direct or indirect equity or voting interest in RingCentral.

RingCentral has no interlocking directorates with any foreign carrier.

(i) By the signature below, RingCentral certifies that it is not affiliated with any foreign carrier.

(j) By the signature below, RingCentral certifies that it does *not* seek to provide international telecommunications services to any destination where: (1) RingCentral is a foreign carrier in that country; (2) RingCentral controls a foreign carrier in that country; (3) any entity or

person that owns more than 25 percent direct or indirect interest in RingCentral or controls RingCentral controls a foreign carrier in that country; or (4) two or more foreign carriers (or entities or persons that control foreign carriers) own, in the aggregate, more than 25 percent of RingCentral and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(k) As RingCentral has not made any affirmative certifications regarding foreign carrier affiliations in response to Section 63.18(j) of the Commission's rules, RingCentral need not make a showing regarding WTO status under Section 63.18(k) of the Commission's rules.

(l) As RingCentral has not made any affirmative certifications regarding WTO status, in response to Section 63.18(k) of the Commission's rules, RingCentral need not make a showing regarding the resale of international switched services of an unaffiliated carrier under Section 63.18(l) of the Commission's rules.

(m) As RingCentral has not made any affirmative certifications regarding resale of international switched services in response to Section 63.18(l) of the Commission's rules, RingCentral need not make a showing regarding non-dominant status under Section 63.18(m) of the Commission's rules.

(n) By the signature below, RingCentral certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end, and that it will not enter into such agreements in the future.

(o) By the signature below, RingCentral certifies that no party to this Application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

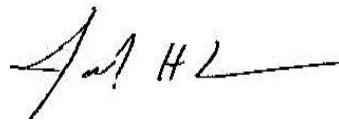
(p) RingCentral respectfully requests streamlined processing of this Application pursuant to Section 63.12 of the Commission's rules, as RingCentral is not affiliated with any foreign carrier, much less one with market power on the foreign end, nor is it affiliated with any dominant U.S. carriers whose services it seeks to resell. Moreover, the application raises no other competition, public interest, or foreign ownership issues.

CONCLUSION

RingCentral respectfully requests that the Commission grant it authority to provide global facilities-based and global resale international telecommunications services pursuant to Section 214 of the Communications Act, as amended, and Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules.

Respectfully submitted,

RINGCENTRAL, INC.



John Marlow
Vice President, Corporate Development,
and General Counsel

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7 November 2008